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TYRONE C. FAHNER
ATTORNEY GENERAL
STATE OF ILLINOIS
SPRINGFIELD
62706

SAUGET/SAUGET

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JUN 18 1982

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

May 10, 1982

Mr. Harold G. Baker, Jr.
Attorney at Law
56 South 65th Street
Belleville, Illinois 62223

RE: People v. Paul Sauget and
Sauget and Company, No. 81-CH-19

Dear Harold:

It has come to my attention that waste, other than general household and demolition type, was accepted by your client at the site which is the subject of the above-referenced suit.

In accordance with the requirements of Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, Browning Ferris Industries of St. Louis and Clayton Chemical Company of Missouri have notified the United States Environmental Protection Agency, Region V Office that hazardous waste was deposited at the landfill operated by your client. I would like to know if your client can tell us, or if he would be willing to tell us, what portions of the site the above-referenced hazardous waste was deposited at. As you are well aware, the area where the site is located is subject to flooding and has a very high water table. Therefore, my primary concern is that the hazardous waste which I believe was deposited at the site must be properly monitored and maintained.

At the time the Pollution Control Board case was filed against your client for inadequate cover and when the pending injunction action was filed neither the Illinois Environmental Protection Agency nor the Attorney General's Office knew that your client was accepting hazardous waste at the site.

The area where the hazardous waste was accepted may in fact need more than just two feet of cover and thus this

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ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Mr. Harold G. Baker, Jr.

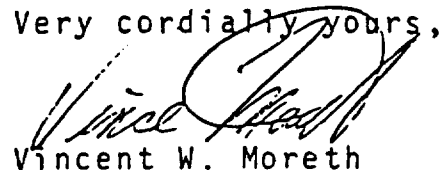
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May 10, 1982

may create a conflict with the relief requested by me and the pending injunction action. Therefore, it is imperative that we determine what portions of the site accepted the hazardous waste.

Further, please check your calendar to see what dates would be convenient to you to set the above-referenced case for trial.

Very cordially yours,

A handwritten signature in dark ink, appearing to read "Vince Moreth", is written over the typed name.

Vincent W. Moreth
Assistant Attorney General
Environmental Control Division
Southern Region

VWM:csm



Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706

217/782-5544

November 19, 1980

Mr. Pat Chesley
Assistant Attorney General
Environmental Control Division
Office of the Attorney General
500 South Second Street
Springfield, Illinois 62706

ST. CLAIR CO.
RECEIVED SAUGET/SAUGET
NOV 20 1980

ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Re: City of Herrin, EPA #988-A, and
Paul Sauget, et al, EPA #3602-A

Dear Pat:

I am writing concerning the status of two land enforcement cases assigned to you. Now that the injunction hearing in Wastex is reaching a conclusion, I would like to know when you can get to these cases.

I am particularly concerned about the Herrin Municipal case where you filed a complaint for an injunction last November. Ken Mensing informs me that Norge and the City are continuing to dump at the site. It disturbs me that we have allowed an injunction complaint to languish in the Circuit Court for an entire year. This delay would seem to reduce our credibility greatly when the matter comes to a hearing.

I also believe that we need to file a complaint in the Sauget final cover case within the next month or so. PCB Order 77-84 issued August 24, 1978, requires the respondents to apply final cover to this site in twenty percent increments every six months, with all cover to be applied by February 24, 1980. Eighty percent of the cover should have been applied by now and has not been applied. The respondents have also failed to post a \$125,000 performance bond and pay \$2,500 of a \$5,000 penalty required by the Board Order. I have enclosed a copy of an inspection report and letter which may not be in your files. Ken Mensing considers this case a priority matter.

Please let me know your timetable in these cases and any more information you need from the Agency to bring these cases to a successful conclusion.

Sincerely,

Stan Parsons

Stan Parsons
Technical Advisor
Enforcement Programs

Enclosures

SP:bkm

cc: B. Seltzer

B. Child

K. Mensing

KM
RJM ✓